

REMARKS

Reconsideration of the present application is respectfully requested. No claims have been amended. Claims 1-9 are canceled. No claims have been added. No new matter has been added.

Claim Rejections35 U.S.C. § 102(e) Rejections

Independent claims 12, 13, 22 and 26 stand rejected under 35 U.S.C. § 102(e) based on U.S. Patent no. 6,687,733, Manukyan ("Manukyan").

Claim 12 recites:

12. A machine-readable medium having sequences of instructions stored therein which, when executed by a processor cause the processor to perform a process comprising:  
**automatically configuring a network cache so that the network cache is able to communicate with a database to authenticate a user; and**  
operating the network cache.  
(Emphasis added).

The above claim recites a limitation of automatically configuring a network cache so that the network cache is able to communicate with a database to authenticate a user.

In rejecting claim 12, the Examiner alleges that Manukyan teaches the above emphasized limitation in claim 12. The Examiner also alleges that Manukyan's controller and interactive server daemon, collectively, qualify to be a network cache with respect to database server (Final Office Action, page 4). Applicant respectfully traverses the rejections and disagrees.

Manukyan does not teach or suggest a network cache. The controller and interactive server daemon, referred by the Examiner, individually or collectively, do not represent a network cache. As stated in Manukyan, "[a] daemon 56 is a program or application software to locate and open a designated port, such as 62, from which services are offered from server 44" (Manukyan: column 8, lines 30-33). "[A] controller 108 functions to provide a means to enable the client 14 to manage or control the services that are provided by the servers of the network 16" (Manukyan: column 18, lines 18-20). Neither the daemon 56 nor the controller 108, according to the above descriptions in Manukyan, even remotely teaches or suggests a network cache. Applicant respectfully requests the Examiner to further explain his ground to claim that the collective entity of daemon 56 and controller 108 represents a network cache.

Furthermore, Manukyan does not teach or suggest automatically configuring a network cache so that the network cache is able to communicate with a database to authenticate a user. Manukyan teaches a method of automatically configuring a server, an interactive server, such that particular service(s) of the server is/are made available to a client according to the client's account setup in a database. The configuration in Manukyan is actually done to predetermined system configuration files located in the interactive server in accordance to the client's account information stored in the database such that particular service(s) available to the client may be added, removed or modified (Manukyan: column 3, lines 4-15). Thus, Manukyan's method is an authorization method, determining whether access to the requested information is permitted or denied based upon predetermined access parameters associated with the client, not an authentication method, which determines whether the user requesting

access is who he claims to be. Even assuming *arguendo* that Manukyan's method is an "authentication" method, the automatic configuration of the interactive server is not done to make the interactive server capable of communicating with a database to authenticate a user, as recited in claim 12. In addition, the database in Manukyan is not used to communicate with the interactive server for authentication purposes, but is used for the purpose of configuring the interactive server's predetermined configuration files.

The Examiner argues that "the interactive server communicates with a database server and the interactive server daemon is programmed to automatically configure/edit predetermined system configuration files including the configuration files that control the functions of authentication/verification" (see the Final Office Action, page 2). However, the communication between the interactive server and the database server is not for authentication purposes, but for the purpose of configuring the interactive server so that particular service(s) is/are made available to a client based on the client's account setup in the database. By contrast, in claim 12, the network cache is automatically configured so that the network cache is able to communicate with a database for the purpose of authenticating a user.

Therefore, Manukyan does not teach automatically configuring a network cache so that the network cache is able to communicate with a database to authenticate a user. Because Manukyan does not teach each and every limitation of claim 12, claim 12 and all claims which depend on it are patentable over Manukyan.

Similarly, claims 13, 22 and 26 all recite the limitation of automatically configuring a network cache so that the network cache is able to communicate with a database to

authenticate a user. Thus, at least for the same reasons discussed above, claim 13, 22, 26 and all claims which depend on them are also patentable over Manukyan.

In addition, claim 13 recites a character string known by the operator to be within a user object located in a database such that the character string is used to automatically configure the network cache. By contrast, Manukyan does not teach or suggest the above limitation.

The Examiner refers to Manukyan's abstract, column 17 lines 13-27 and column 17 lines 33-36 and alleges that these sections teach or suggest a character string, such as recited in claim 13. Applicant respectfully analyzed the referred sections, but did not find any teaching or suggestion regarding a character string known by an operator to be within a user object located in a database and used for automatically configuring a network cache, such as recited in claim 13. Applicant respectfully request the Examiner to point out specifically which part of the discussion constitutes such a character string known by an operator to be within a user object located in a database and used for automatically configuring a network cache.

At least for this additional reason, therefore, claim 13 and all claims which depend on it are patentable over Manukyan.

### 35 U.S.C. § 103(a) Rejections

Independent claims 10 and 21 stand rejected under 35 U.S.C. § 103(a) based on U.S. Patent no. 6,321,259 Quellette et al. ("Quellette") in view of Manukyan. Applicant respectfully traverses the rejections and submits that the Examiner has not met the

burden to establish a *prima facie* case under § 103(a), at least for the reason that Quellette and Manukyan do not teach or suggest, individually or in combination, all the claim limitations of claims 10 and 21, even assuming *arguendo* that Quellette teaches the listed limitations, as the Examiner alleges on Page 6 of the Office Action.

Claim 10 recites:

10. A method for automatically configuring a network cache, the method comprising:  
receiving as input from a user interface a user ID of a user object located in a database;  
querying the database for the user ID;  
outputting to the user interface objects having the user ID;  
receiving a selection of the user object to associate with the user ID;  
retrieving the user object;  
outputting to the user interface attributes of the user object;  
receiving a selection of an attribute name associated with the user ID within the user object;  
**storing the attribute name associated with the user ID in a configuration file in the network cache;**  
receiving a selection of the attribute names associated with one or more group ID's within the user object;  
**storing the attribute names associated with the one or more group ID's in a configuration file in the network cache;**  
receiving a selection of an object other than the user object having the user ID;  
retrieving the object;  
receiving a selection of the attribute names associated with the attributes utilized to identify the non-parent group; and  
**storing the attribute names in a configuration file in the network cache.**  
(Emphasis added).

The Examiner admits that Quellette does not disclose expressly "storing the attribute names in a configuration file in the network cache", but contends that Manukyan does. In supporting his contention, the Examiner points to Manukyan's Abstract lines 1-10, column 17 lines 13-27 & lines 33-36, column 18 lines 41-44 and column 19 lines 6-10 & lines 33-41. (the Final Office Action, page 7). However, none of

these cited discussions of Manukyan discloses or teaches storing the attribute names associated with user identities in a configuration file. Specifically, Manukyan's Abstract lines 1-10 discusses a server daemon which automatically locates, configures and edits predetermined system configuration files located in an interactive server. Manukyan's column 17 lines 13-27 & lines 33-36 discusses generating "task" according to a client's account setup change and automatically executes the "task" to change the interactive server's configuration accordingly. Manukyan's column 18 lines 41-44 discusses using a controller to help a client to organize its account information. Manukyan's column 19 lines 6-10 & lines 33-41 gives a specific example of generating a "task" and executing the task to change the server configuration accordingly. Nothing is mentioned or even implicated with regard to writing attribute names associated with user identities into the predetermined system configuration files.

The Examiner further alleges that

Manukyan is relied upon providing an interactive server communicates with a database server such that the interactive server daemon is programmed to automatically configure/edit predetermined system configuration files (Figure 3 Element 48/78 and column lines 5-10) **including the configuration files that control the functions of authentication/verification (Manukyan: column 10 lines 36-56) and manage the adding (i.e. storing) of the configuration context (such as the attribute name/values of the authentication parameters) as to automatically edit/setup the configuration file for authentication purpose as taught by Manukyan (column 10 lines 36-56).** (the Final Office Action, page 8, *emphasis added*)

As discussed above, Manukyan teaches a method of automatically configuring a server, the interactive server, such that particular service(s) of the server is/are made available to a client according to the client's account setup in a database. The communication between the interactive server and the database server is not for

authentication purpose, but for the purpose of configuring the interactive server so that particular service(s) is/are made available to a client based on the client's account setup in the database. Manukyan column 10 lines 36-56 has no discussion of configuration context, nor is there any discussion about attribute names/values of the authentication parameters. Thus, the Examiner has no foundation to claim that the server daemon manages the adding (i.e. storing) of the configuration context (such as the attribute name/values of the authentication parameters) as to automatically edit/setup the configuration file for authentication purpose. In fact, Manukyan has explicitly made it clear that the "[s]ever configuration file is a program written in high level computer language that includes a list of executable commands, sequences and options that are required to be executed by the operating system of the server. These executable commands, sequences and options are executed by the operating system to setup or modify the service made available to the client as desired by the client or specified by the host company." (Manukyan: column 10 lines 23-30) Thus, the Examiner has erred to claim that the configuration files may contain attribute names associated with user identities.

In sum, because Manukyan and Quellette do not teach or suggest each and every limitation of claim 10, claim 10 and all claims which depend on it are patentable over the cited arts.

For the same reasons, because claim 21 includes a similar limitation of storing attribute names, claim 21 and all claims which depend on it are patentable over the cited arts.

Dependent Claims


In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If any additional fee is required, please charge Deposit Account No. 02-2666.

Respectfully submitted,  
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